

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA, et al.,

Plaintiffs,

vs.

APPLE INC.,

Defendant.

Case No. 2:24-cv-04055

**CERTIFICATION OF ANDREW F.  
ESOLDI, DEPUTY ATTORNEY  
GENERAL IN SUPPORT OF MOTION  
FOR ADMISSION OF ROBERT J.  
CARLSON *PRO HAC VICE***

I, Andrew F. Esoldi, of full age, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey admitted to practice before this Court, and a Deputy Attorney General in the Consumer Fraud Prosecution Section, with the State of New Jersey, Department of Law and Public Safety, Division of Law. I represent the State of New Jersey, by and through the Attorney General Matthew J. Platkin (“New Jersey”), in the above-captioned matter.

2. I respectfully submit this certification in support of New Jersey’s application for an Order admitting pursuant to Local Rule 101.1(c) counsel Robert J. Carlson for the Plaintiff State of Oklahoma, by and through its respective Attorney General, *pro hac vice* in the above-captioned matter.

3. I am a member in good standing of the bar of the State of New Jersey and of the United States District Court for the District of New Jersey.

4. As set forth more fully in his certification, Robert J. Carlson is an Assistant Attorney General with the State of Oklahoma Office of the Attorney General (“Oklahoma”), with offices located at 15 West 6<sup>th</sup> Street, Suite 1000, Tulsa, OK 74119. Mr. Carlson has advised me that he is a member in good standing of the bars of Oklahoma and Montana. Mr. Carlson represents

Oklahoma in antitrust and related enforcement actions, which is a complex field of law in which he specializes. He is fully familiar with the facts of this case. There is good cause for the *pro hac vice* admission of Mr. Carlson, as he is familiar with the facts, issues, and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Oklahoma in this matter.

5. Pursuant to Local Rule 101.1(c)(4), New Jersey will appear in this action, including all court appearances, on behalf of the Plaintiff State of Oklahoma, and agrees to accept service of all notices, orders, and pleadings in this action. I, or an attorney representing New Jersey, by and through the Attorney General, will sign and file all pleadings, enter all appearances, sign all stipulations, and other such documents in this matter on behalf of the Plaintiff State of Oklahoma. I agree to be responsible for the conduct of the above-named counsel should he be admitted *pro hac vice*.

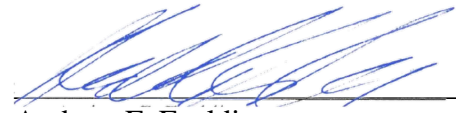
6. I will make certain that counsel to be admitted *pro hac vice* pursuant to this motion will comply with Local Rule 101.1(c).

7. Counsel for Defendant Apple Inc. has advised me that they consent to the *pro hac* admission of the above-named counsel.

8. Accordingly, I respectfully request that this Court enter an Order admitting Robert J. Carlson representing the Plaintiff State of Oklahoma, by and through its Attorney General, *pro hac vice* in the above-captioned matter.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY



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Dated: September 16, 2024